

EXHIBIT 2

IN THE DISTRICT COURT OF BECKHAM COUNTY FILED
STATE OF OKLAHOMA

BECKHAM COUNTY
FILED

AUG 13 2021

DONNA HOWELL, COURT CLERK
DEPUTY

BY

Case No. CJ-21-72

DEEDRA HARPER)
Plaintiff,)
vs.)
3 D WOLF TRANSPORT, LLC and)
DANIEL JOSEPH WOLF)
Defendants.)

PETITION

COMES NOW the Plaintiff, Deedra Harper, and for her cause of action against the Defendants states as follows:

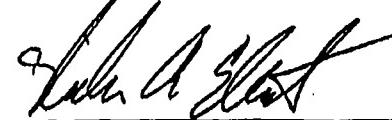
1. On or about October 4, 2019, in Elk City, Oklahoma, Beckham County, the Defendant, Daniel Joseph Wolf, was transporting goods via a commercial motor carrier.
2. The vehicle Defendant Wolf was driving was under the control of 3 D Wolf Transport, LLC, who was the motor carrier for the load being hauled at the time of the collision.
3. Defendant Wolf negligently ran a red light causing a collision with Plaintiff's vehicle.
4. As a result of the collision, Plaintiff suffered bodily injury.
5. Defendant 3D Wolf Transport, LLC is vicariously liable under the doctrine of respondeat superior for the negligent actions of its employee Daniel Joseph Wolf.
6. Plaintiff seeks compensatory damages for past and future medical bills, past and future pain and suffering, loss of quality of life, disfigurement, loss of future earning capacity, and lost wages, among others.

7. Plaintiff seeks to submit to the jury the issue of whether Defendants acts/omissions rise to the level of gross negligence and/or reckless disregard such that punitive damages are warranted.

WHEREFORE, Plaintiff prays for judgment against the Defendants as set forth above with her costs, attorney's fees, interest and other such relief the Court shall deem proper all of which are in excess of diversity jurisdiction.

RESPECTFULLY SUBMITTED,

WEST ♦ YLLA ♦ GOSNEY



Nicholas A. Elliott, OBA #32226
William A. Gosney, OBA #22573
8 S.W. 89th Street, Suite 200
Oklahoma City, OK 73139
(405) 800-8080 Phone
(405) 378-0711 Fax
nelliott@wyglawfirm.com
Attorneys for Plaintiff

Attorneys' Lien Claimed